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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SEMICAPS PTE LTD.

Plaintiff,

v.

HAMAMATSU CORPORATION, *et al.*

Defendants.

Case No: 17-cv-03440-DMR

**JOINT STIPULATION TO ENTER
PROTECTIVE ORDER**

Judge: Magistrate Judge Donna M. Ryu

Pursuant to Local Rule 7-12 and the Court's March 23, 2020 Order, Plaintiff SEMICAPS Pte Ltd. ("Plaintiff" or "SEMICAPS") and Defendants Hamamatsu Photonics K.K., Hamamatsu Corporation, and Photonics Management System (collectively, "Defendants" or "Hamamatsu") hereby jointly and respectfully request that the Court enter the parties' proposed Protective Order, attached hereto as Exhibit 1. As set forth in Exhibit 2 (Declaration of K. Kevin Chu), the proposed Protective Order is identical to the Northern District of California's Patent Local Rule 2-2 Interim Model Protective Order except for (a) the addition of case-identifying information, and (b) the removal of the ability of "Designated House Counsel" to access "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" information in this matter.

Dated: March 26, 2020

By: /s/ Ryan J. Marton

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*Attorneys for Defendants Hamamatsu
Corporation et al.*

ATTESTATION IN CONCURRENCE OF FILING

In accordance with the Northern District of California's General Order No. 45, Section X.B., I, Ryan Goldstein, attest that concurrence in the filing of this document has been obtained from each of the other signatories who are listed on the signature pages.

Dated: March 26, 2020

By: /s/ David Eiseman

David Eiseman

CERTIFICATE OF SERVICE

I, Joseph LeRoy, certify that pursuant to Local Rule 5-5, counsel of record who have consented to electronic service are being served on March 26, 2020 with copies of the attached document(s) via the Court's CM/ECF system, which will send notification of such filing to counsel of record.

Executed on March 26, 2020, at San Francisco, California.

/s/ Joseph LeRoy
Joseph LeRoy